

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

JUL 26 2023

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOE JASSO and
RACHAEL JASSO,

Defendants.

MITCHELL R. ELFERS
CLERK

CRIMINAL NO. 23-1160 MLG

Count 1: 18 U.S.C. §§ 922(a)(1)(A) 924:

Engaging in the Business Without a

License (Firearms); 18 U.S.C. § 2: Aiding

and Abetting;

Count 2: 18 U.S.C. §§ 922(o) and 924:

Illegal Possession of a Machine Gun; 18

U.S.C. § 2: Aiding and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about February 3, 2023, and continuing to on or about February 16, 2023, in Bernalillo County, in the District of New Mexico, the defendants, **JOE JASSO** and **RACHAEL JASSO**, not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, willfully engaged in the business of dealing in firearms.

In violation of 18 U.S.C. §§ 922(a)(1)(A), 924 and 2.

Count 2

On or about February 16, 2023, in Bernalillo County, in the District of New Mexico, the defendants, **JOE JASSO** and **RACHAEL JASSO**, knowingly possessed a machinegun, a machine gun conversion device.

In violation of 18 U.S.C. §§ 922(o), 924 and 2.

FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 18 U.S.C. § 922(a)(1)(A), which requires willfulness, or conviction of any offense in violation of 18 U.S.C. § 922(o) in which the defendants are demonstrated to have acted willfully, the defendants, **JOE JASSO** and **RACHAEL JASSO**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. one Glock Switch machine gun conversion device;
- b. one AR15 auto sear machine gun conversion device;
- c. one Rossi, Model R22S, 22 caliber rifle bearing serial number 7CA181368N;
- d. one Zastava, Model PAP M92 PV, 7.62 caliber rifle bearing serial number Z92-080691;
- e. one Mossberg, Model 590, 12-gauge shotgun bearing serial number V1127916;
- f. one Romarm/Cugir, Model Micro Draco, 7.62 caliber pistol bearing serial number PMD-31860;
- g. one Glock GMBH, Model 27GEN5, 40 caliber pistol with a machine gun conversion device attached bearing serial number BUDC603;
- h. one HS Produkt (Im Metal), Model XD9 Sub-Compact, 9 mm pistol bearing serial number BA369828;
- i. one Glock GMBH, Model 26GEN4, 9 mm pistol bearing serial number BDNZ636;
- j. one HS Produkt (Im Metal), Model Hellcat, 9 mm caliber pistol bearing serial number BA757350;
- k. one Romarm/Cugir rifle, model and caliber unknown, bearing serial number 23223-20;
- l. approximately four machine guns from an unknown manufacturer, model AR15 auto sear bearing no serial numbers;

- m. approximately 14 rounds of assorted 9 mm ammunition;
- n. approximately 364 rounds of assorted multi-caliber ammunition;
- o. approximately two rounds of assorted 9 mm ammunition;
- p. approximately one round of Speer 9 mm ammunition;
- q. approximately 29 rounds of Winchester-Western 9 mm ammunition;
- r. approximately 28 rounds of Tula Cartridge Works 7.62 caliber ammunition;
- s. approximately 85 rounds of assorted unknown caliber ammunition;
- t. approximately 62 rounds of assorted unknown caliber ammunition;
- u. approximately 25 rounds of assorted unknown caliber ammunition;
- v. approximately 22 rounds of Fiocchi 9 mm ammunition;
- w. approximately 13 rounds of assorted 40 caliber ammunition;
- x. approximately 15 rounds of assorted 9 mm ammunition;
- y. approximately 13 rounds of unknown caliber ammunition contained inside a magazine;
- z. approximately 37 rounds of Hirtenberger 9 mm caliber ammunition;
- aa. approximately two rounds of Federal 45 caliber ammunition;
- bb. approximately 22 rounds of assorted 40 caliber ammunition;
- cc. approximately 177 rounds of assorted 22 caliber ammunition;
- dd. approximately one round of Federal 9 mm ammunition;
- ee. approximately 125 rounds of assorted multi-caliber ammunition;
- ff. approximately nine rounds of assorted unknown caliber ammunition;
- gg. approximately 41 rounds of assorted unknown caliber ammunition;
- hh. approximately 194 rounds of assorted unknown caliber ammunition;
- ii. approximately seven rounds of assorted unknown caliber ammunition;

- jj. approximately 33 rounds of Western Cartridge Co. 223 caliber ammunition;
- kk. approximately eight rounds of assorted 9 mm caliber ammunition;
- ll. approximately 116 rounds of assorted unknown caliber ammunition;
- mm. approximately 21 rounds of assorted 7.62 caliber ammunition; and
- nn. approximately 87 rounds of assorted unknown caliber ammunition.

In addition, the defendants, **JOE JASSO** and **RACHAEL JASSO**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm and ammunition intended to be used to violate 18 U.S.C. § 922(a)(1) where the firearm and ammunition intended to be used in the offense was involved in a pattern of activities which includes a violation of 18 U.S.C. § 922(a)(1) including, but not limited to:

- a. one Glock Switch machine gun conversion device;
- b. one AR15 auto sear machine gun conversion device;
- c. one Rossi, Model R22S, 22 caliber rifle bearing serial number 7CA181368N;
- d. one Zastava, Model PAP M92 PV, 7.62 caliber rifle bearing serial number Z92-080691;
- e. one Mossberg, Model 590, 12-gauge shotgun bearing serial number V1127916;
- f. one Romarm/Cugir, Model Micro Draco, 7.62 caliber pistol bearing serial number PMD-31860;
- g. one Glock GMBH, Model 27GEN5, 40 caliber pistol with a machine gun conversion device attached bearing serial number BUDC603;
- h. one HS Produkt (Im Metal), Model XD9 Sub-Compact, 9 mm pistol bearing serial number BA369828;
- i. one Glock GMBH, Model 26GEN4, 9 mm pistol bearing serial number BDNZ636;
- j. one HS Produkt (Im Metal), Model Hellcat, 9 mm caliber pistol bearing serial number BA757350;

- k. onw Romarm/Cugir rifle, model and caliber unknown, bearing serial number 23223-20;
- l. approximately four machine guns from an unknown manufacturer, model AR15 auto sear bearing no serial numbers;
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- ll. approximately 116 rounds of assorted unknown caliber ammunition;
- mm. approximately 21 rounds of assorted 7.62 caliber ammunition; and
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A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney